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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JERRY ALEXANDER, et al., on behalf
themselves and all others similarly situated

Plaintiffs,

v.

DEAN MEILING, MADYLON MEILING,
JAMES PROCTOR, JANET CHUBB,
individuals, CHEMEON SURFACE
TECHNOLOGY, LLC, METALAST SURFACE
TECHNOLOGY, LLC, D&M-MI, LLC, DSM
PARTNERS, LTD., MEILING FAMILY
PARTNERS, LTD., and MERIDIAN
ADVANTAGE,

Defendants.

CASE NO.: 3:16-cv-00572-MMD-CBC

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
RESPONSES TO DEFENDANTS'
MOTIONS TO DISMISS AND RELATED
FILINGS**

(SECOND REQUEST)

Plaintiffs and Defendants, by and through their undersigned counsel stipulate and agree
as follows:

1. On November 19, 2019, Defendants Dean Meiling, Madylon Meiling, Chemeon
Surface Technology, LLC, Metalast Surface Technology, LLC, D&M-MI, LLC, DSM Partners,
Ltd., and Meiling Family Partners, Ltd. (collectively, "Meiling Defendants") filed their
Renewed Motion to Dismiss (ECF No. 134) and Special Motion to Dismiss (ECF No. 137), as
well as their Request for Judicial Notice related to the Renewed Motion to Dismiss (ECF No.

1 135) and Declaration of Timothy A. Lukas (ECF No. 136) (together, the “Meiling Defendants’
2 Motions”).

3 2. On November 22, 2019, Defendant Janet Chubb filed her Motion to Dismiss
4 Claims Contained in Class Action (ECF No. 140) and joinders to the Meiling Defendants’
5 Motions (ECF Nos. 138 and 139) (together, the Chubb Defendant’s Motions”).

6 3. Pursuant to LR II 7-2(b), Plaintiffs responses to the Meiling Defendants Motions
7 were due on or before December 3, 2019, and their response to the Chubb Defendant Motions
8 was due on or before December 6, 2019.

9 4. On December 4, 2019, this Court granted the Parties’ stipulation to resetting the
10 due dates for responses to the Meiling Defendants’ Motions and the Chubb Defendant’s Motions
11 (ECF No. 142), which set a new due date of December 13, 2019. This Stipulation further
12 extended the deadline for the Meiling Defendants and the Chubb Defendant to file reply briefs
13 to January 3, 2020.

14 5. The parties hereby stipulate to extend the deadline for Plaintiffs to respond to the
15 Meiling Defendants’ Motions and Chubb Defendant’s Motion until December 16, 2019, an
16 extension of three (3) calendar days.

17 6. The parties hereby further stipulate to extend the deadline for the Meiling
18 Defendants and the Chubb Defendant to file reply briefs until January 6, 2020, an extension of
19 three (3) calendar days

20 7. Pursuant to LR IA 6-1, this second request for an extension for Plaintiffs to file
21 their response briefs and for the Meiling Defendants’ Motions and the Chubb Defendant to file
22 their reply briefs. Plaintiffs make this request with good cause and in good faith and not for
23 purposes of delay. The Parties in this action have worked to coordinate the timing for filing
24 pleadings in this case and affiliated cases in a consolidated fashion, and to account for the
25 availability of counsel over the holiday periods. This particular request is made to accommodate
26 the deposition calendar for Plaintiffs’ counsel in a different matter along with complexities in
27 Plaintiffs’ review and analysis of draft responses to the Meiling Defendants’ Motions and the
28 Chubb Defendant’s Motions given the large number of putative class plaintiffs. This is the

Parties' second request for an extension of time to file responses to the motions. Counsel do not believe that the brief extension requested herein will cause any undue delay in this action.

IT IS SO STIPULATED.

DATED this 13th day of December, 2019.

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IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE/

DATED:

December 16, 2019

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that on the 13th day of December, 2019, I caused the document entitled **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSES TO DEFENDANTS' MOTIONS TO DISMISS AND RELATED FILINGS**, to be served as follows:

Attorneys of Record	Parties Represented	Method of Service
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/s/ Kathy MacElwain

An employee of Holley Driggs Walch Fine
Puzey Stein & Thompson